

The Honorable Lauren King
The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; and THE THOUGHT & EXPRESSION CO., INC., a Virginia corporation,

Plaintiffs,

V.

AMANDEEP SINGH, an individual; and
BHUSHAN KUMAR, an individual; and DOES
1-10.

Defendants.

No. 2:24-cv-01464-LK-BAT

**MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANTS AMANDEEP
SINGH AND BHUSHAN KUMAR**

WITHOUT ORAL ARGUMENT

**NOTE ON MOTION CALENDAR:
NOVEMBER 21, 2024**

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and The Thought &

Expression Co. d/b/a Thought Catalog (“Plaintiffs”) move, pursuant to Federal Rule of Civil Procedure 55(a) and Local Civil Rule 55(a), for entry of default against Defendants Amandeep Singh and Bhushan Kumar (“Defendants”).

On September 13, 2024, Plaintiffs filed a Complaint against Defendants who advertised and sold infringing Thought Catalog-branded books in the Amazon.com store. Dkt. 1.

On October 24, 2024, Plaintiffs filed a Motion for Alternative Service, seeking an order allowing service upon Defendants through the email addresses used to register the Selling Accounts under their control and the email addresses Defendants used to register financial

1 accounts linked to their Selling Accounts. *See, generally*, Dkt. 16. The Court granted the Motion
 2 (Dkt. 19) and Plaintiffs successfully served Defendants via email on October 25, 2024. *See*
 3 Certificate of Service, Dkt. 20. Defendants' responsive pleadings were due on or before
 4 November 15, 2024. Fed. R. Civ. P. 12(a)(1)(A)(i).

5 Defendants did not respond to the emails through which Plaintiffs served them with
 6 process, have not since appeared in this action personally or through counsel, have not filed or
 7 served an answer in this action during the time provided by Rule 12 of the Federal Rules of Civil
 8 Procedure, and have not otherwise indicated any intent to participate in this litigation. Fed. R.
 9 Civ. P. 12(a)(1)(A)(i). Accordingly, Plaintiffs respectfully request that the Court enter an order
 10 of default against Defendants.

11
 12 *I certify that this memorandum contains 236 words, in compliance with the Local Civil*
 13 *Rules.*

14
 15 DATED this 21st day of November, 2024.

16 DAVIS WRIGHT TREMAINE LLP
 17 Attorneys for Plaintiffs

18 s/ Scott R. Commerson
 19 Scott R. Commerson, WSBA #58085
 20 865 South Figueroa Street, Suite 2400
 21 Los Angeles, CA 90017-2566
 Tel: (213) 633-6800
 Fax: (213) 633-6899
 Email: scottcommerson@dwt.com

The Honorable Lauren King
The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; and THE THOUGHT & EXPRESSION CO., INC., a Virginia corporation,

Plaintiffs,

V.

AMANDEEP SINGH, an individual; and
BHUSHAN KUMAR, an individual; and DOES
1-10.

Defendants.

No. 2:24-cv-01464-LK-BAT

**[PROPOSED] CLERK'S ORDER
GRANTING MOTION FOR ENTRY
OF DEFAULT AGAINST
DEFENDANTS AMANDEEP SINGH
AND BHUSHAN KUMAR**

Defendants.

The Court, having considered the Motion, the governing law, and being fully advised, finds that Defendants have not filed a responsive pleading to the Complaint (Dkt. 1), which they were required to do by November 15, 2024, in accordance with Federal Rule of Civil Procedure 12(a)(1)(A)(i).

[PROPOSED] CLERK'S ORDER GRANTING
MOTION FOR ENTRY OF DEFAULT- 1
(2:24-cv-01464-LK-BAT)

Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1640
206.622.3150 main • 206.757.7700 fax

1 Accordingly, it is hereby ORDERED that Defendants Amandeep Singh and Bhushan
2 Kumar are in default.

3

4 SO ORDERED this _____ day of _____, 2024.

5

6

7

CLERK OF COURT

8

9 Presented by:

10 DAVIS WRIGHT TREMAINE LLP
Attorneys for Plaintiffs

11

12 s/ Scott Commerson
Scott Commerson, WSBA #58085
13 865 South Figueroa Street, Suite 2400
Los Angeles, CA 90017-2566
14 Tel: (213) 633-6800
Fax: (213) 633-6899
15 Email: scottcommerson@dwt.com

16

17

18

19

20

21

22

23

24

25

26

27